



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

September 4, 2012

Mr. Brian J. O'Grady, Vice President-Nuclear
and Chief Nuclear Officer
Nebraska Public Power
Cooper Nuclear Station
72676 648A Avenue
Brownville, NE 68321

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR COOPER NUCLEAR STATION
(REPORT 05000298/2012006)

Dear Mr. O'Grady:

On August 15, 2012, the NRC completed its mid-cycle performance review of Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2011, through June 30, 2012. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. The security inspection plan will be sent via separate correspondence.

The NRC determined the performance at Cooper Nuclear Station during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC identifies substantive cross-cutting issues to communicate a concern with the licensee's performance in a cross-cutting area and to encourage the licensee to take appropriate action before more significant performance issues emerge. In our assessment letter dated March 5, 2012, (ML120650243), the NRC opened a substantive cross-cutting issue in the problem identification and resolution area associated with the corrective action component related to the thoroughness of problem evaluations such that the resolutions address causes and extent of condition [P.1(c)]. Your staff determined that the primary cause was a result of inadequate or inconsistent management oversight, and secondary causes were 1) control errors as a result of inadequate management oversight and follow-up on issues, and 2) organizational interface breakdowns as a result of inadequate organization-to-organization performance in addressing issues.

During this assessment period, we noted there has not been sustainable improvement in this area, as evidenced by the identification of 8 findings with this cross-cutting theme [P1(c)]. As a result, this substantive cross-cutting issue [P.1(c)] will remain open until your staff demonstrates sustainable performance improvements as evidenced by effective implementation of an

appropriate corrective action plan that results in no safety significant inspection finding and a notable reduction in the overall number of inspection findings with the same common theme. Because this is the second consecutive assessment letter documenting a substantive cross-cutting issue with the same cross-cutting aspect, the NRC requests that you provide us a written response that details your corrective actions to address this cross-cutting theme including schedule, milestones, and performance monitoring metrics. The NRC will continue to monitor your staff's effort and progress in addressing this theme and will inspect your response to this theme after you notify us, in writing, of your readiness for inspection.

The NRC also identified a cross-cutting theme in the resources component of the human performance area, in that the NRC identified four findings associated with procedures that were not complete, accurate and up-to-date [H.2(c)]. The NRC determined that a substantive cross-cutting issue does not exist because the NRC does not have a concern with your staff's scope of effort and progress in addressing the cross-cutting theme. Specifically, while there were four inspection findings with this theme, we determined that this represented a recent performance trend. Also, once you identified this theme, you placed it into your corrective action program and are presently developing plans to address this theme. The NRC will continue to monitor your staff's efforts and progress in addressing this theme until the theme criterion is no longer met.

The NRC also identified a cross-cutting theme in the work practices component of the human performance area, in that the NRC identified four findings associated with the failure to ensure appropriate supervisory oversight of work activities to support nuclear safety [H.4(c)]. The NRC determined that a substantive cross-cutting issue does not exist because the NRC does not have a concern with your staff's scope of effort and progress in addressing the cross-cutting theme. Specifically, while there were four inspection findings with this theme, we determined that this represented a recent performance trend. Also, once you identified this theme, you placed it into your corrective action program and are presently developing plans to address this theme. The NRC will continue to monitor your staff's efforts and progress in addressing the theme until the theme criterion is no longer met.

In the current assessment period, the NRC again identified a cross-cutting theme in the decision-making component of the human performance area, in that the NRC identified eight findings associated with issues related to the use of conservative decision-making [H.1(b)]. The NRC determined that a substantive cross-cutting issue exists because the NRC has a concern with your staff's scope of effort and progress in addressing this cross-cutting theme. Specifically, this theme repeats a theme that was identified in the 2009 mid-cycle and end-of-cycle assessment letters, declared a substantive cross-cutting issue in the 2010 end-of-cycle letter, reviewed in the 2011 mid-cycle letter, and closed in the 2011 end-of-cycle letter. This theme again became apparent in the fourth quarter of the current assessment period. On July 25, 2012, your staff initiated CR-CNS-2012-04267 to acknowledge this repeat theme and is presently in the early stages of identifying corrective actions to again mitigate the theme.

In recent years, you have implemented several corrective actions that were intended to mitigate this theme. Some have been successful, in the short-term, in mitigating the theme; however, none has been sustainable in substantially mitigating this cross-cutting theme even though a reasonable duration of time has passed for your corrective actions to show sustained progress. The NRC will close this substantive cross-cutting issue when you demonstrate sustainable performance improvement as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection findings and a notable

reduction in the overall number of inspection findings with the same common theme. The NRC plans to perform focused baseline inspections of this theme after you notify us in writing of your readiness for inspection.

The enclosed inspection plan lists the inspections scheduled through December 31, 2013. Routine inspections performed by resident inspectors are not included in the inspection plan. In addition to the baseline inspections, consistent with the Agency's actions related to Fukushima, the NRC will perform TI-187, "Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns," and TI-188, "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns." The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 817-200-1144 with any questions you may have regarding this matter.

Sincerely,

/RA/

Vincent Gaddy, Chief
Reactor Projects Branch C
Division of Reactor Projects

Docket No: 50-298
License No: DPR-46

Enclosure: Cooper Nuclear Station Inspection / Activity Plan

cc w/Enclosure: Electronic Distribution

Electronic Distribution by RIV:

Regional Administrator (Elmo.Collins@nrc.gov)
 Deputy Regional Administrator (Art.Howell@nrc.gov)
 DRP Director (Kriss.Kennedy@nrc.gov)
 Acting DRP Deputy Director (Allen.Howe@nrc.gov)
 Acting DRS Director (Thomas.Blount@nrc.gov)
 Acting DRS Deputy Director (Patrick.Louden@nrc.gov)
 Senior Resident Inspector (Jeff.Josey@nrc.gov)
 Resident Inspector (Christopher.Henderson@nrc.gov)
 CNS Administrative Assistant (Amy.Elam@nrc.gov)
 Branch Chief / C (Vincent.Gaddy@nrc.gov)
 Senior Project Engineer (Bob.Hagar@nrc.gov)
 Project Engineer (Raymond.Kumana@nrc.gov)
 Public Affairs Officer (Victor.Dricks@nrc.gov)
 Public Affairs Officer (Lara.Uselding@nrc.gov)
 Regional State Liaison Officer (Bill.Maier@nrc.gov)
 Congressional Affairs Officer (Jenny.Weil@nrc.gov)
 Branch Chief, DRS/EB1 (Thomas.Farnholtz@nrc.gov)
 Branch Chief, DRS/EB2 (Geoff.Miller@nrc.gov)
 Branch Chief, DRS/PSB1 (Michael.Hay@nrc.gov)
 Acting Branch Chief, DRS/PSB2 (James.Drake@nrc.gov)
 Branch Chief, DRS/OB (Mark.Haire@nrc.gov)
 Branch Chief, DRS/TSB (Ray.Kellar@nrc.gov)
 Director, DIRS, NRR (Ho.Nieh@nrc.gov)
 Deputy Director, DIRS NRR (John.Lubinski@nrc.gov)
 Director, DORL, NRR (Michele.Evans@nrc.gov)
 Deputy Director, DORL, NRR (Louis.Lund@nrc.gov)
 Chief, PLB IV, DORL, NRR (Michael.Markey@nrc.gov)
 NRR Project Manager (Lynnea.Wilkins@nrc.gov)
 RIV/ETA: OEDO (Silas.Kennedy@nrc.gov)
 RA Administrative Assistant (Lisa.Quayle@nrc.gov)
 DRA Administrative Assistant (Anita.Tannenbaum@nrc.gov)
 RITS Coordinator (Marisa.Herrera@nrc.gov)
 TSB Technical Assistant (Loretta.Williams@nrc.gov)
 RidsNrrDirslpabResource@nrc.gov
 ROPreports@nrc.gov

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ADAMS: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes		<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials:VGG
		<input checked="" type="checkbox"/> Publicly Available	<input checked="" type="checkbox"/> Non-Sensitive
		<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive
C:DRP/A	D:DRS	D:DRP	C:DRP/A
VGaddy	TBlount	KKennedy	VGaddy
/RA/	/RA/	/RA/	/RA/
8/20/12	8/20/12	8/28/12	8/29/12

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Unit Number	Planned Dates Start	Planned Dates End	Inspection Activity	Title	No. of Staff on Site
1	09/17/2012	09/21/2012	EXAM X02489	- INITIAL OPERATOR EXAM INITIAL EXAM - COOPER (08/2012)	3
1	10/29/2012	11/02/2012	X02489	INITIAL EXAM - COOPER (08/2012)	
1	03/01/2012	06/30/2013	2515/182 IP 2515/182	- DEGRADATION UNDERGROUND PIPING (PHASE 1) Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping	3
1	07/01/2012	12/31/2012	2515/187 IP 2515/187	- NTTF FLOODING WALKDOWNS Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns	2
1	07/06/2012	12/31/2012	2515/188 IP 2515/188	- NTTF SEISMIC WALKDOWNS Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns	2
1	10/22/2012	11/02/2012	PSP2-08 IP 7111108G	- INSERVICE INSPECTION Inservice Inspection Activities - BWR	1
1	10/29/2012	11/02/2012	EB2-03 IP 71003	- POST-APPROVAL LICENSE RENEWAL (PHASE 1) Post-Approval Site Inspection for License Renewal	2
1	11/05/2012	11/09/2012	RS13 IP 71124.01	- RADIATION SAFETY Radiological Hazard Assessment and Exposure Controls	2
1	11/05/2012	11/09/2012	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	11/05/2012	11/09/2012	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	11/05/2012	11/09/2012	IP 71151-PR01	RETS/ODCM Radiological Effluent	
1	01/01/2013	12/31/2013	2515/188 IP 2515/188	- NTTF SEISMIC WALKDOWNS Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns	2
1	07/01/2013	12/31/2013	2515/187 IP 2515/187	- NTTF FLOODING WALKDOWNS Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns	2
1	02/25/2013	03/08/2013	EB1-17T IP 7111117T	- 50.59 & PERM PLANT MOD Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	2
1	02/25/2013	03/08/2013	IP 7111117T-chng/1st	change/test/evaluations	
1	02/25/2013	03/08/2013	IP 7111117T-evals	evaluations	
1	02/25/2013	03/08/2013	IP 7111117T-permod	permanent mods	
1	03/11/2013	03/29/2013	PI&R 52B IP 71152B	- BIENNIAL PI&R Problem Identification and Resolution	4
1	04/29/2013	05/03/2013	PSB2-RP IP 71124.05	- RADIATION SAFETY Radiation Monitoring Instrumentation	4
1	04/29/2013	05/03/2013	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	04/29/2013	05/03/2013	IP 71124.07	Radiological Environmental Monitoring Program	

Unit Number	Planned Dates Start	Planned Dates End	Inspection Activity	Title	No. of Staff on Site
1	04/29/2013	05/03/2013	PSB2-RP - RADIATION SAFETY IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	4
1	06/24/2013	06/28/2013	EP1 - BIENNIAL PROGRAM INSPECTION IP 7111402	Alert and Notification System Testing	1
1	06/24/2013	06/28/2013	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	06/24/2013	06/28/2013	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	08/12/2013	08/16/2013	EB2-05T - TRIENNIAL FIRE PROTECTION INSPECTION IP 7111105T	Fire Protection [Triennial]	4
1	08/26/2013	08/30/2013	IP 7111105T	Fire Protection [Triennial]	
1	08/05/2013	08/09/2013	PSB2-RP - RADIATION PROTECTION IP 71124.01	Radiological Hazard Assessment and Exposure Controls	2
1	08/05/2013	08/09/2013	IP 71124.02	Occupational ALARA Planning and Controls	
1	08/05/2013	08/09/2013	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	08/05/2013	08/09/2013	IP 71151-PR01	RETS/ODCM Radiological Effluent	
1	10/07/2013	10/11/2013	EB2-03 - POST-APPROVAL LICENSE RENEWAL IP 71003	Post-Approval Site Inspection for License Renewal	5
1	10/21/2013	10/25/2013	IP 71003	Post-Approval Site Inspection for License Renewal	